

REMARKS

As a result of this amendment, claims 1-66 are pending in the application. Of these, claims 1-3, 8-9, 11, 13-17, 22-23, 25, 27-30 and 32 stand rejected as obvious under 35 USC §103(a) and claims 33-66 are new.

A detailed response to the rejections and indication of support for the new claims follows. However, applicant reserves all applicable rights not exercised in connection with this response, including, for example, the right to swear behind one or more of the cited references, the right to rebut any tacit or explicit characterization of the references, and the right to rebut any asserted motivation for combination. Applicant makes no admission regarding the prior art status of the cited references, regarding them as being only of record.

Response to §103 Rejections

The Office Action rejects claims 1-3, 8-9, 11, 13-17, 22-23, 25, 27-30 and 32 under 35 USC §103(a) as obvious over Shultz (U.S. 5,640,553) in view of Chang (US 2002/0052871A1). Claims 4, 7, 12, 18, 21, 26 and 31 were rejected similarly over Shultz and Chang and further in view of Fries. (US 6,393,415). And claims 5-6, 10, 19-20 and 24 were rejected similarly over Shultz and Chang in view of Macke (U.S. 6,249,784).

In response, applicant respectfully submits that the rejection appears moot in view of the amendment of independent claims 1, 13, and 27. These claims now recite that the expanded query includes at least one non-synonymous term---more precisely, a term that is not synonymous with any of the identified key terms in the user-entered query.

In contrast, neither Schultz nor Chang appear to teach this feature. Although Schultz reports a "semantic network," it does not teach use of non-synonymous terms. See, for example, column 23, lines 46-55, which state

If the query term is not a slow word or proper noun, it is applied to a semantic network in step 142d to determine expansion words corresponding to the query term. For purposes of the present invention, **the term "semantic network" means a database in which each term carries with it semantic information such as, for example, part of speech and synonym information.** For a given query word, only those expansion words from the semantic network which are of the same part of speech as the query term are added to the

terms in the natural language query in step 142f. (Emphasis added.)

There is no evidence in this passage, nor any other in Schultz, that one of ordinary skill would regard as teaching expansion of queries to include non-synonymous terms. Likewise, Chang also fails to teach expansion of queries to include non-synonymous terms.

Accordingly, applicant requests respectfully that the Examiner reconsider and withdraw all the rejections based in whole or in part on the combination of Schultz and Chang.

Support for New Claims

This amendment adds new claims 33-66, addressing other originally described features and/or aspects of the invention and/or further specifying one or more previously claimed features or aspects. Exemplary support for the notion of expanding a query to include non-user-input terms that have a causal semantic relationship with user-input terms is found at least at paragraphs 22 and 37. Exemplary support for the notion of expanding a query to include non-user-input terms that have a subject matter relationship with user-input terms is found at least at paragraphs 26, 32, and 33. Exemplary support for recursive expansion of queries, that is, expanding a query to include a first term based on a user input term, and then further expanding the query to include a second term based on the first term, is found at least at paragraphs 31 and 34. Paragraph 34 also provides exemplary support for the notion of providing a synopsis with details regarding the similarity and differences of files obtained in expanded search results relative to those in unexpanded search results. Exemplary support for the graphical user interface or other presentation aspects is found at least in Figure 6 and related text at paragraphs 39 and 40.

CONCLUSION

In view of the amended claims and these remarks, applicant requests respectfully that the Examiner reconsider the application. Also, applicant invites the Examiner to telephone its patent counsel Eduardo Drake at (612) 349-9593 to resolve any issues which may delay allowance.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

JOEL K. HAMMOND

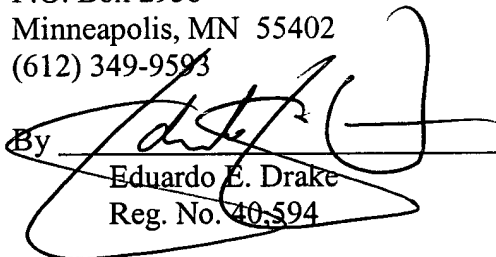
By his Representatives,

SCHWEGMAN, LUNDBERG, WOESSNER & KLUTH, P.A.
P.O. Box 2938
Minneapolis, MN 55402
(612) 349-9593

Date

13 Sept. 2004

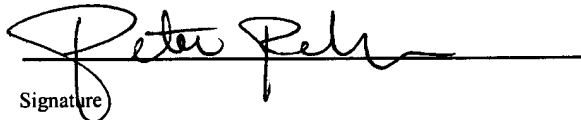
By


Eduardo E. Drake
Reg. No. 40,594

CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: MS Amendment, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on this 13 day of September, 2004.

Peter Rebuffoni

Name


Signature